

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
KEISHA K. MATTHEWS
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Keisha_Matthews@fd.org
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7 Attorney for Miguel Angel Ramirez-Gonzalez

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 MIGUEL ANGEL RAMIREZ-GONZALEZ,

15 Defendant.

Case No. 2:25-mj-00108-BNW

**STIPULATION TO CONTINUE
BENCH TRIAL**
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Sigal Chattah, United
18 States Attorney, and Skyler Pearson, Assistant United States Attorney, counsel for the United
19 States of America, and Rene L. Valladares, Federal Public Defender, and Keisha K. Matthews,
20 Assistant Federal Public Defender, counsel for Miguel Angel Ramirez-Gonzalez, that the bench
21 trial currently scheduled on June 25, 2025, at the hour of 9:00 a.m., be vacated and continued
22 to a date and time convenient to the Court but no sooner than ninety (90) days.

23 This Stipulation is entered into for the following reasons:

24 1. Counsel for the defendant needs additional time to receive, review discovery and
25 conduct investigations to determine whether there are any pretrial issues that must be litigated
26 and whether the case will ultimately go to trial or will be resolved through negotiations.

2. Defense counsel has requested additional discovery.

3. The defendant is out of custody and agrees with the need for the continuance.

4. The parties agree to the continuance.

5. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.

This is the first request for a continuance of the bench trial.

DATED this 23rd day of June 2025.

RENE L. VALLADARES
Federal Public Defender

SIGAL CHATTAH
United States Attorney

/s/ Keisha K. Matthews
By _____

/s/ Skyler Pearson
By _____

KEISHA K. MATTHEWS
Assistant Federal Public Defender

SKYLER PEARSON
Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL ANGEL RAMIREZ-GONZALEZ,

Defendant.

Case No. 2:25-mj-00108-BNW

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for the defendant needs additional time to receive, review discovery and conduct investigations to determine whether there are any pretrial issues that must be litigated and whether the case will ultimately go to trial or will be resolved through negotiations.

2. Defense counsel has requested additional discovery.

3. The defendant is out of custody and agrees with the need for the continuance.

4. The parties agree to the continuance.

5. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the

1 opportunity within which to be able to effectively and thoroughly prepare for trial, taking into
2 account the exercise of due diligence.

3 The continuance sought herein is excludable under the Speedy Trial Act, title 18, United
4 States Code, Section 3161(h)(7)(A), when considering the facts under Title 18, United States
5 Code, §§ 316(h)(7)(B) and 3161(h)(7)(B)(iv).

6 **ORDER**

7 IT IS THEREFORE ORDERED that the bench trial currently scheduled on Wednesday,
8 June 25, 2025, at 9:00 a.m., be vacated and continued to October 8, 2025 at 9:00 a.m.

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11 DATED this 23 day of June 2025.

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14 UNITED STATES MAGISTRATE JUDGE
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